

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

	&	
Willis Floyd Wiley	&	
Plaintiff	&	
V	&	Civil Action #
Conns Home Plus	&	
Department Store	&	
Defendant	&	

Title III of the Americans  
With Disabilities Act ( ADA )  
Violation Lawsuit

To the Honorable Judge of said court

Come now Willis Floyd Wiley Floyd Wiley the Plaintiff in the above civil Action  
Number file this his Title III of the American with Disabilities Act ( ADA ) violation  
Lawsuit against Conns Home Plus Department store for violating section III -1.2000  
Public Accommodation, section III – 4. 3100 General, section III – 1. 3000 Commercial  
Facilities, section III – 5. 4100 shopping center or mall, section III -4. 2600 Personal  
Service and devices, of title III of the American with disabilities Act (ADA) and also for  
Violating the Plaintiff fourteenth Amendment Right to the United States constitution  
And In support of said Title III of the American with Disabilities Act (ADA) violation  
Lawsuit. The Plaintiff will show the Honorable court the following

I

Jurisdiction

The Honorable court has jurisdiction over this subject matter according  
To Title III of the American with Disabilities Act (ADA) and the fourteenth  
Amendment to the United States Constitution

II

Allegation

Plaintiff alleges that Conns Home Plus Department store has violated and  
Continuing to violate title III of the American with disabilities Act (ADA) sec  
III – 1. 2000 Public Accommodation, sec III – 4. 3100 General, sec III- 1. 3000  
Commercial facilities, sec III – 5. 4100 shopping center or mall, sec – 4. 2600  
Personal services and devices, and the fourteenth Amendment to the United  
And the fourteenth Amendment to the United constitution by not proving  
The Plaintiff who is one hundred percent disable, Accommodation inside Conns  
Home Plus Department store to fill out a job Application.

III

Plaintiff of the Lawsuit

Plaintiff Willis Floyd Wiley is sueing Conns Home Plus Department Store in its official capacity for violating title III of the American with Disabilities Act (ADA) sec III – 1. 2000 Public Accommodation, sec III – 4. 3100 General , sec III – 1 . 3000 Commercial facilities, sec III 5 . 4100 shopping center or mall, sec III 4. 2600 Personal services and devices, And for violating the Plaintiff right to fourteenth Amendment of the United States constitution.

The Plaintiff resides at 9222 Lockwood # 16 Houston Texas 77016

VI

Defendant to the Lawsuit

Defendant # 1 Conns home Plus Department store is being sued in its Official capacity for violating title III of the American with Disabilities Act (ADA) sec III – 1. 2000 Public Accommodation, sec III – 4. 3100 General, sec III – 5. 4100 shopping center or mall, sec III- 4. 2600 Personal services and Devices, and for violating the Plaintiff right to the fourteenth Amendment Right to the United states constitution.

The defendant resides at northline commons 4446 north Fwy Houston Texas 77022

VI

Lawsuit conclusion and prayer Deman for a jury trial and Damages

In conclusion of the Lawsuit wherefore Permission is consider the Plaintiff Pray that the Honorable court Grant the Plaintiff a jury trial on the facts in this Lawsuit and at said jury Trial the Plaintiff will present evidence to show the defendant did violate title III of the American with disabilities Act (ADA) sec III – 1. 2000 Public Accommodation, sec III – 4. 3100 General, sec III – 1. 3000 commercial facilities, sec 111 – 5. 4100 shopping center or mall, Sec -4. 2600 Personal services and devices, and the defendant violate the Plaintiff fourteenth Amendment to the United states constitution and in the event the jury rules in the Plaintiff Favor the Plaintiff ask to be awarded damages for Emotional distress in the amount of One hundred thousand dollars ( \$ 100,000.00 ) compensatory damages in the Amount of one Hundred thousand dollars and Punitive Damages in the amount of ( \$ 100,000.00 ) one Hundred thousand dollars because of the defendant violation of the Plaintiff fourteenth Amendment Right to the United states constitution.

Pro.se Willis Floyd Wiley

9222 Lockwood # 16

Houston Tx 7701

# No: 832- 359-4346

S.B. O.T. #

V

I Willis Floyd Wiley Certify that a true and correct copy of said title III of the American with Disabilities Act (ADA) violation Lawsuit has been hand delivered to the United states District Clerk office on this the 22 day of June 2015

  
Willis Floyd Wiley

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